

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

SCOTT DENING, an individual,

Plaintiff,

v.

GLOBE LIFE AMERICAN INCOME
DIVISION a/k/a AMERICAN INCOME
LIFE INSURANCE COMPANY, and
GLOBE LIFE INC.

Defendants.

Case No. 1:23-cv-1117

Hon. Hala Y. Jarbou

**DECLARATION OF JEFFREY M. HAMMER IN SUPPORT OF
AMERICAN INCOME LIFE INSURANCE COMPANY'S
MOTION FOR ATTORNEYS' FEES AND COSTS**

I, Jeffrey M. Hammer, declare and state as follows:

1. I am duly admitted to practice before this Court. I am an attorney at King & Spalding LLP, counsel for Defendant American Income Life Insurance Company ("AIL") in the above-captioned matter. I submit this declaration in support of AIL's Motion for Attorneys' Fees and Costs.

2. Attached as **Exhibit A** is a true and correct copy of the State Bar of Michigan's 2023 Economics of Law Survey, which is available at https://www.michbar.org/file/pmrc/pdfs/2_2023EOL_SurveyResults.pdf.

3. I am a partner in King & Spalding LLP's Los Angeles office and have 18 years of experience in commercial litigation. Throughout my career, I have litigated a variety of complex commercial disputes in state and federal court throughout the country. A more complete summary

of my experience is set forth in my law firm profile, a true and correct copy of which is attached as **Exhibit B**.

4. Kathleen A. Sacks is Counsel in King & Spalding LLP's Washington, D.C. office and has 14 years of experience. She has litigated a variety of complex commercial disputes and enforcement actions in state and federal court throughout the country. A more complete summary of Ms. Sacks's experience is set forth in her law firm profile, a true and correct copy of which is attached as **Exhibit C**.

5. Hunter N. Southall is an Associate in King & Spalding LLP's San Francisco office and graduated from Harvard Law School in 2023. A more complete summary of Ms. Southall's experience is set forth in her law firm profile, a true and correct copy of which is attached as **Exhibit D**.

6. Attached as **Exhibit E** are records reflecting the hours that the lawyers listed above spent on preparing AIL's Motion to Compel Discovery ("Motion") and to prepare for and attend the hearing on AIL's Motion, as well as the specific tasks completed. The attached records are based on the contemporaneous time entries created by the billing attorneys.

7. Attached as **Exhibit F** is a compilation of records reflecting the costs that AIL incurred in connection with bringing the Motion. These costs include the following:

- a. \$1,430.21 in airfare; and
- b. \$407.85 in hotel expenses.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 2nd day of May, 2024.

A handwritten signature in black ink, reading "Jeffrey M. Hammer", is written over a horizontal line.

Jeffrey M. Hammer